

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA

In re: : Case No. 17-10393 TPA  
Jeffrey A. Laird, : Chapter 13  
Debtor :

Jeffrey A. Laird, :  
Movant :  
vs. : Document No.  
Ronda J. Winnecour, Chapter 13 Trustee, :  
Respondent :

MOTION TO CONVERT CASE TO CHAPTER 7

The Debtor, Jeffrey A. Laird, by his undersigned attorney, Rebeka A. Seelinger, Esquire,  
respectfully represents the following:

1. The debtor, Jeffrey A. Laird, commenced this case by filing a voluntary petition in bankruptcy on April 18, 2017, under Chapter 13 of the Bankruptcy Code.
2. The debtor attempted to obtain a mortgage loan modification through the LMP Program, but that effort was unsuccessful, as reported by the debtor on August 4, 2017 in his LMP Final Report.
3. The debtor thereafter attempted to fund a plan through the sale of his home, but he has been unable to sell the home.
4. The debtor is unable to afford plan payments to cure and reinstate his mortgage, and wishes to convert this case to Chapter 7.
5. This case has not previously been converted from one Chapter to another.

WHEREFORE, the debtor requests that your Honorable Court enter an order converting this case to Chapter 7.

May 11, 2018

/s/ Rebeka Seelinger Esq.  
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